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November 5, 2008

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

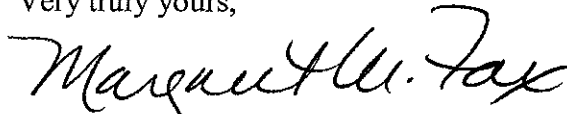
Re: Application of PRTCommunications, LLC for Designation
as an Eligible Telecommunications Carrier
Docket No. 2008-300-C

Dear Mr. Terreni:

Enclosed for filing on behalf of PRTCommunications, LLC in the above-referenced matter please find the Direct Testimony of Randal J. Odom. By copy of this letter and certificate of service, a copy of this Direct Testimony is being served on all parties of record.

Thank you for your assistance.

Very truly yours,


Margaret M. Fox

Enclosure

cc: C. Lessie Hammonds, Esquire
Randal J. Odom, PRTCommunications, LLC

BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION
DOCKET NO. 2008-300-C

Application of PRTCommunications, LLC)
for Designation as an Eligible)
Telecommunications Carrier)

DIRECT TESTIMONY OF RANDAL J. ODOM

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.**My name is Randal J. Odom. My business address is 201 Anderson Drive, Laurens, South
3 Carolina 29360.

4 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

5 **A.**I am testifying on behalf of PRTCommunications, LLC ("PRTC"). I am Chief Financial
6 Officer and Manager of Administrative and Regulatory Affairs for PRTC and Piedmont
7 Rural Telephone Cooperative, Inc. ("PRT Cooperative").

8 **Q. PLEASE BRIEFLY OUTLINE YOUR EDUCATION, TRAINING, AND**
9 **EXPERIENCE.**

10 **A.**I received a Bachelor of Science degree in Economics and a Master in Business from
11 Western Carolina University. I have been in my current positions for the past 8 years. I
12 have 20 years of business experience, concentrating in financial management. My
13 experience include business acquisitions, marketing analysis, automating business

1 practices, long- and short-range financial planning, financial modeling, managing
2 compensation programs, and market research.

3 **Q. PLEASE DESCRIBE THE COMPANY'S WIRELESS OPERATIONS.**

4 **A.** PRTC is a wireless common carrier utilizing its own facilities to provide wireless voice
5 and data services within the Clinton and Laurens wire centers, a portion of the Fountain
6 Inn wire center, and the entire rural company study area served by PRT Cooperative,
7 PRTC's parent and owner. PRTC has provided service in these areas since 2000. PRT
8 Cooperative is a rural telecommunications cooperative that has provided high-quality
9 telecommunications services, including wireline services, to rural South Carolina for
10 many years.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 **A.** The purpose of my testimony is to demonstrate that PRTC satisfies the state and federal
13 requirements for designation as an Eligible Telecommunications Carrier ("ETC") in the
14 State of South Carolina within the proposed areas, and that such designation is in the
15 public interest.

16 **Q. ARE YOU FAMILIAR WITH THE FEDERAL REQUIREMENTS FOR**
17 **DESIGNATION AS AN ETC?**

18 **A.** Yes. In order to be designated as an ETC, an applicant must (1) be a common carrier, (2)
19 demonstrate its capability and commitment to offer specific supported services through its
20 own facilities or through a combination of its own facilities and resale of another carrier's
21 facilities, (3) satisfy advertising obligations, and (4) describe in detail the geographic
22 service area for which it is seeking designation. The South Carolina Public Service

Commission ("the Commission") shall designate additional ETCs in areas served by non-rural incumbent local exchange carriers ("ILECs") if it is consistent with the public interest, convenience, and necessity. The Commission must find that designation as a competitive ETC is in the public interest before designating an additional ETC in an area served by a rural telephone company.

Q. IS PRTC A COMMON CARRIER?

A. Yes. The Company is authorized by the Federal Communications Commission ("FCC") to provide commercial mobile radio service ("CMRS") through the Personal Communications Services ("PCS") license that is held by the Company. PRTC uses its PCS license exclusively to provide telecommunications services.

Q. WHAT ARE THE "SUPPORTED SERVICES" THAT MUST BE OFFERED?

A. As set forth in FCC Rule 54.101(a)(1)-(9), the FCC requires that the carrier offer the following specific services or functionalities that are designated for support either by using its own facilities or through a combination of its own facilities and resale of another carrier's facilities. The services that are designated for support under the FCC's requirements are:

- 1) voice grade access to the public switched network ("PSTN");
- 2) Local usage;
- 3) Dual tone multi-frequency signaling ("DTMF Signaling") or its functional equivalent;
- 4) Single-party service or its functional equivalent;
- 5) Access to emergency services;

- 6) Access to operator services;
- 7) Access to interexchange service;
- 8) Access to directory assistance; and
- 9) Toll limitation for qualifying low-income consumers.

Q. BRIEFLY DESCRIBE THE SUPPORTED SERVICES AND EXPLAIN HOW PRTC PROVIDES OR WILL PROVIDE EACH OF THE SERVICES.

A. The Company offers or will offer all of the following supported services throughout its entire service area:

Voice Grade Access to the PSTN - PRTC satisfies this requirement by offering its subscribers voice grade access at a bandwidth between 300 and 3,000 Hertz, as prescribed in the FCC rules.

Local Usage - The FCC has required that an ETC service offering must include local usage comparable to that offered by the ILECs in the areas where it seeks designation; however, the FCC has not prescribed a specific local usage requirement. In granting the ETC application of HTC Communications, LLC ("HTCC"), the Commission found that HTCC satisfied this local usage requirement by "committ[ing] to develop and offer a wireless service plan that includes unlimited local calling in a manner and price that is the same as what is offered by the incumbent LEC in its designated service area." Similar to HTCC, PRTC satisfies this requirement in that it hereby commits to develop and offer a wireless service plan that includes unlimited local calling in a manner and price that is the same as that offered by the incumbent LEC in its designated service area.

DTMF Signaling or its Equivalent - PRTC provides DTMF signaling.

1 Single-party service or its functional equivalent – PRTC’s PCS service is a wireless
2 telecommunications service that uses spectrum shared among users to provide service and
3 satisfies this requirement by providing a dedicated message path for the length of the
4 user’s particular transmission.

5 Access to emergency services – PRTC provides all of its subscribers with access to
6 911 and is capable of providing E911 information to the appropriate Public Service
7 Access Point (“PSAP”).

8 Access to operator services – PRTC provides its subscribers with access to operator
9 services by enabling subscribers to dial “0.”

10 Access to interexchange service – PRTC provides its subscribers with access to
11 interexchange service as defined by the FCC’s Rules.

12 Access to directory assistance – PRTC provides its subscribers with access to directory
13 assistance by enabling subscribers to dial “411.”

14 Toll limitation for qualifying low-income consumers – The FCC has ruled that “toll
15 limitation for qualifying low-income consumers” means either “toll blocking” or “toll
16 control” for ETCs that are incapable of providing both services. The Company satisfies
17 this requirement by providing toll limitation for qualifying low-income customers by
18 utilizing “toll blocking.” The Company also offers prepaid wireless service, which
19 prevents the subscriber of the prepaid service from exceeding the allotted amount of
20 minutes.

1 **Q. DOES PRTC OFFER OR INTEND TO OFFER THE SUPPORTED SERVICES**
2 **EITHER USING ITS OWN FACILITIES OR A THROUGH A COMBINATION**
3 **OF ITS OWN FACILITIES AND RESALE OF ANOTHER CARRIER'S**
4 **SERVICES?**

5 **A.** Yes. PRTC will offer the supported services through use of its own facilities or through a
6 combination of its own facilities and resale of another carrier's services. The Company
7 uses its existing CMRS network infrastructure, consisting of antennas, mobile switching,
8 trunking, cell sites, network equipment and interconnection arrangements with other
9 carriers, together with any expansions and enhancements to that network to provide the
10 supported services in the wire centers in the areas for which it seeks designation.

11 **Q. ANOTHER REQUIREMENT FOR ETC DESIGNATION IS ADVERTISEMENT**
12 **OF AVAILABILITY OF THE SUPPORTED SERVICES. HOW DOES PRTC**
13 **INTEND TO SATISFY THIS REQUIREMENT?**

14 **A.** The FCC's Rules provide that carriers designated as ETCs shall advertise the availability
15 of such services and the charges therefor using media of general distribution. In granting
16 ETC designation to HTCC, the Commission found that HTCC satisfied this requirement
17 by committing to make advertisements of the availability of the services supported by
18 federal Universal Service Funds ("USF") and their applicable charges in the same manner
19 as the ILECs, and that the advertisements would be "designed to disclose to all potential
20 customers the services available to them, and the applicable charges for those services,
21 including Lifeline and Link-Up programs for qualifying low-income individuals."
22 Likewise, PRTC hereby commits to advertise the availability of the services supported by

1 federal USF and their applicable charges in the same manner as the ILECs in its proposed
2 designated service area and to design the advertisements to disclose to all potential
3 customers the services available to them, and the applicable charges for those services,
4 including Lifeline and Link-Up programs for qualifying low-income individuals.
5 Methods of such advertising may include television, radio, newspaper, direct mailing, bill
6 inserts, telephone directory advertising, and billboard advertising.

7 **Q. PLEASE IDENTIFY THE SERVICE AREA FOR WHICH PRTC SEEKS**
8 **DESIGNATION AS A COMPETITIVE ETC.**

9 **A.** PRTC seeks designation as an ETC for the area that coincides with its wireless footprint.
10 PRTC's wireless footprint covers the non-rural ILEC wire center in Laurens, which is
11 served by Verizon South Inc. ("Verizon"), the non-rural ILEC wire center in Clinton,
12 which is served by BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina
13 ("AT&T"), a portion of the non-rural Fountain Inn wire center served by AT&T, and the
14 entire rural ILEC study area served by PRT Cooperative. While PRTC proposes to be
15 designated in only a portion of the non-rural Fountain Inn wire center, the entire area for
16 which PRTC seeks designation is larger than a wire center and coincides with PRTC's
17 licensed wireless service area. Therefore, the designation is appropriate.

18 **Q. IS PRTC AUTHORIZED TO PROVIDE SERVICE THROUGHOUT THE**
19 **REQUESTED SERVICE AREA?**

20 **A.** Yes. PRTC is currently licensed by the FCC to provide wireless telecommunications
21 services throughout the area in which it has requested ETC designation in this
22 proceeding.

1 **Q. HAS THE COMMISSION ADOPTED ADDITIONAL CRITERIA IN ADDITION**
2 **TO THE FCC REQUIREMENTS ADDRESSED ABOVE?**

3 **A.** Yes. Commission regulations require an ETC applicant to demonstrate the following:

- 4 1) A commitment to provide service to all customers making reasonable request
5 for service,
- 6 2) A plan specifying improvements and upgrades,
- 7 3) Functionality in emergencies,
- 8 4) Satisfaction of consumer protection and service quality standards, and
- 9 5) Offer a local usage plans comparable to ILECs.

10 **Q. HOW DOES PRTC SATISFY EACH OF THESE REQUIREMENTS?**

11 **A.** I will address each of the additional Commission requirements in turn:

12 1. Commitment to Provide Service to All Customers Making Reasonable Request for
13 Service

14
15 PRTC commits to providing service on a timely basis throughout its service area to all
16 customers making a reasonable request for service within PRTC's existing network
17 coverage area. If the potential customer is within PRTC's licensed service area but
18 outside its existing network coverage, PRTC commits to providing service within a
19 reasonable period of time if service can be provided at reasonable cost by:

- 20 (a) modifying or replacing the requesting customer's equipment; (b)
- 21 deploying a roof-mounted antenna or other equipment; (c) adjusting the
- 22 nearest cell tower; (d) adjusting network or customer facilities; (e)
- 23 reselling services from another carrier's facilities to provide service; or (f)
- 24 employing, leasing or constructing an additional cell site, cell extender,
- 25 repeater, or other similar equipment.

26
27 PRTC commits to offer its services to customers making reasonable requests for such in

1 accordance with the process set forth in Commission and FCC regulations.

2 2. Plan Specifying Improvements and Upgrades
3

4 The Commission requires ETC applicants to submit a two-year plan that “describes with
5 specificity proposed improvements or upgrades to the applicant’s network on a wire
6 center-by-wire center basis, or on a cell site-by-cell site basis if the applicant is a wireless
7 carrier” throughout its proposed designated service area. PRTC has previously submitted
8 to the Commission under seal a confidential Revised Network Improvement Plan (“the
9 Plan”) which demonstrates how the Company plans to expand its network to ensure that
10 “unserved and underserved rural or high-cost areas will receive sufficient signal quality,
11 that coverage or capacity will improve due to the receipt of high-cost support throughout
12 the area for which [the Company] seeks designation.” The Plan contains detailed maps of
13 the coverage area before and after proposed improvements, including existing cell site
14 locations and coverage, and the locations and coverage of new cell sites or nodes which
15 the Company plans to construct over the next two years. Additionally, the Plan describes
16 specific geographic areas where improvements will be made; includes projected start and
17 completion dates for each improvement funded by support; specifies estimated amounts
18 of investment for each project funded by the support; specifies the estimated population
19 to be served by the improvements; and explains the basis if improvements are not needed.
20 The Plan also shows how funding will be used to further supported services and provides
21 a statement as to how improvements funded by support would not otherwise occur absent
22 support, and would be used in addition to normal expenses incurred. In addition to the
23 submission of the Plan, the Company hereby commits to providing annual progress

1 reports.

2 3. Functionality in Emergencies

3 PRTC ensures functionality in the event of a utility power failure by providing that all
4 (wireless) nodes in the network are equipped with at least two- to four-hour battery
5 backup power (dependent on actual subscriber usage) and standby generator ports for
6 deployment of mobile power generators. All traffic is transported on redundant SONET
7 systems to protect against facility cable cuts and equipment failure.

8 4. Satisfaction of Consumer Protection and Service Quality Standards

9 The Commission has determined that a commitment by an applicant to comply with the
10 Cellular Telecommunications and Internet Association's Consumer Code for Wireless
11 Service ("CTIA's Code") satisfies this requirement. PRTC hereby certifies that it is
12 committed to complying with CTIA's Code.

13 5. Offers Local Usage Plans Comparable to ILECs

14 As described above, PRTC satisfies this requirement by committing to develop and offer
15 a wireless service plan that includes unlimited local calling in a manner and price that is
16 the same as what is offered by the ILEC in its designated service area.

17 **Q. HAS PRTC CERTIFIED ITS ACKNOWLEDGMENT THAT IT MAY BE**
18 **REQUIRED TO OFFER EQUAL ACCESS TO LONG DISTANCE CARRIERS?**

19 **A.** Yes. In my Affidavit, attached as Exhibit A to the Company's Application, PRTC
20 acknowledged that as an ETC the FCC may require it to provide equal access to long

1 distance carriers in the event that no other eligible carrier is providing equal access within
2 the service area.

3 **Q. HAS PRTC CERTIFIED THAT IT OFFERS OR WILL OFFER THE**
4 **SUPPORTED SERVICES USING ITS OWN FACILITIES OR A COMBINATION**
5 **OF ITS OWN FACILITIES AND RESALE OF ANOTHER CARRIER'S**
6 **SERVICES?**

7 **A.** Yes. In my Affidavit filed with the Application, PRTC certified that it currently offers all
8 of the services that are supported by the federal universal support mechanisms using
9 PRTC's own facilities or a combination of its own facilities and of another carrier's
10 services.

11 **Q. HAS PRTC CERTIFIED THAT IT DOES OR WILL ADVERTISE USING**
12 **MEDIA OF GENERAL DISTRIBUTION THE AVAILABILITY OF SUCH**
13 **SERVICES, INCLUDING LIFELINE SERVICES AND THE APPLICABLE**
14 **CHARGES?**

15 **A.** Yes. In my Affidavit filed with the Application, PRTC certified that it does and will
16 continue to advertise, using media of general distribution, the availability of the services
17 that are supported by the federal universal support mechanisms, and applicable charges
18 for those services. The Affidavit certified that the Company will be in compliance with
19 all state and federal LifeLine/Link-Up requirements, including certification, verification
20 and outreach requirements.

1 **Q. IS DESIGNATION OF PRTC AS AN ETC IN THE PUBLIC INTEREST?**

2 **A.** Yes. PRTC's designation as an ETC will serve the public interest by bringing the
3 benefits of increased consumer choice and unique advantages of PRTC's service
4 offerings to consumers. Designation will also allow the Company to provide improved
5 network coverage and greater access to emergency services, particularly in the rural part
6 of the State served by PRT Cooperative. In addition to offering all of the supported
7 services and offerings similar to other wireless carriers, the Company offers its
8 subscribers bundled calling plans which include flat-rate plans. PRTC provides high-
9 quality service and is able to meet the needs of communities in a reasonable time frame.
10 Additionally, unlike the large national wireless carriers, PRTC is locally owned and
11 operated and has local offices that are conveniently located in the rural communities,
12 allowing it to react quickly to customer needs. This personalized service is further
13 enhanced by the fact that the Company's employees are from the rural areas where the
14 Company serves.

15 In addition, the Company utilizes a Nokia Wireless Base Transceiver Station ("BTS")
16 network, which is part of the AT&T Wireless Network and currently provides wireless
17 PCS service to over 92 percent of the population residing within the service boundary.
18 Benefits of being part of the AT&T Wireless Network include full digital switching
19 provided by a centralized fully redundant Nokia Base Station Control ("BSC") and
20 CALEA compliant switches. Through this state-of-the-art network, PRTC is able to
21 provide wireless service to the local community, to emergency service providers and to
22 public school systems with coverage that exceeds that of all other carriers operating

1 within the service boundary. PRTC also provides all subscribers access to emergency
2 services and is already E911 Phase II compliant even though the local PSAP has not yet
3 indicated that it is ready to receive and process the E911 Phase II information.

4 **Q. IS CREAMSKIMMING AN ISSUE IN THIS PROCEEDING?**

5 **A.** No, the Commission does not need to consider creamskimming in this proceeding.
6 "Creamskimming" occurs when competitors serve only the low-cost, high revenue
7 customers in a rural telephone company's study area. In its regulations, the Commission
8 has determined that a creamskimming analysis will only be conducted in instances where
9 an ETC applicant seeks designation below the study area level of a rural telephone
10 company. Because PRTC seeks designation for the entire study area of PRT Cooperative,
11 there is no concern that creamskimming will occur.

12 **Q. WILL GRANTING PRTC'S APPLICATION JEOPARDIZE THE STABILITY OF**
13 **THE FEDERAL USF FUND?**

14 **A.** No. The FCC recently released an order that establishes, on an interim basis, a cap on
15 competitive ETC support for each state. As demonstrated herein and in the Company's
16 Application, the areas for which PRTC seeks support include all of Laurens County and
17 portions of Spartanburg, Union and Abbeville counties, all of which are predominantly
18 rural in nature. If designated as an ETC in these areas, PRTC will be able to utilize
19 federal USF support to provide state-of-the-art wireless mobile voice and advanced
20 services to these rural areas of the state and, because of the imposition of the cap, will be
21 able to do so in a manner that will not jeopardize the stability of the federal USF fund.

1 **Q. WHAT IS PRTC'S COMMITMENT WITH RESPECT TO USE OF FEDERAL**
2 **HIGH COST FUNDS IN SOUTH CAROLINA?**

3 **A.** In my Affidavit filed as Exhibit A with the Company's Application, the Company
4 certified that, if designated as an ETC, upon receipt of the federal high cost USF, it will
5 use these funds only for the provision, maintenance, and upgrading of facilities and
6 services for which the support is intended. PRTC respectfully requests that the
7 Commission issue a finding that PRTC has met the high-cost certification requirement
8 and that PRTC is, therefore, entitled to begin receiving high-cost support consistent with
9 the FCC's USF distribution rules as of the date PRTC is granted ETC status.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A.** Yes, it does.

BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION


Docket No. 2008-300-C

Application of PRTCommunications,)
LLC for Designation as an Eligible)
Telecommunications Carrier)

CERTIFICATE OF SERVICE

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the Direct Testimony of Randal J. Odom upon the following counsel of record by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as follows:

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211-1263.


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November 5, 2008

Columbia, South Carolina